



Education Trust

‘Inspiring the individuals of today, for a better society tomorrow,
“Aspire, Belong, Collaborate”

GIFTS and HOSPITALITY POLICY

Review Frequency	Annual
Reviewed	June 2025
Next Review	June 2026
Agreed by Trustees	15 th July 2025



Purpose:

The principle of integrity requires that Trust/School staff and Trustees/Governors should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

The process set out in this policy and procedure is designed to safeguard employees, trustees and governors from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011. The Ministry of Justice has published guidance which provides the basis for inclusion in this policy. This guidance is under section 9 of the Act.

Scope:

This procedure applies to all Staff of the Trust, Trustees and School Governors

GIFTS

- You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (approximately £25 or below) or free promotional pens, calendars, diaries or similar items may be accepted. In the case of a group of parents from children in the same class, for example, present a joint gift, the individual contributions should be considered rather than the total amount, but the PROVEIT test (below) should still be applied.
- Gifts which are intended for the Trust / School as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be deposited with the School Office, for use by the School.
- Personal gifts may not be solicited under any circumstances.
- When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- All gifts received must be recorded in the School's Gifts and Hospitality Register, which is maintained by the respective School Office.

SUPPLIER SPECIAL OFFER GIFTS

- Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the School and must be handed to the School Office for use by the School.



HOSPITALITY

- You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the School. The timing of hospitality in relation to procurement or purchasing decision that the School may be taking is especially sensitive. You should never solicit hospitality. As a general rule, you should not accept hospitality that the School would not reciprocate in similar circumstances.
- If necessary, you should pay your share of any costs and claim these in the usual way.
- When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- You may accept modest working meals and light refreshments without making any declaration. All other hospitality must be recorded in the Trust's gifts and hospitality register which is maintained by the Finance Office.

Other hospitality may be accepted where:

- You are representing the School in the community or are imparting information about the School to the public.
- An event is clearly part of the life of the community or where the School should be seen to be represented.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

EXPENSE CLAIMS

- The Head of School or Chief Finance Officer should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in light of it.
- Any hospitality provided should not be extravagant.
- Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

PROVEIT TEST



Please use the following guideline to determine whether an offer of a gift or hospitality is acceptable:

- PURPOSE – Token, thanks or seeking a favour? (token or thanks = yes; favour = no)
- RULES – What are they? Does this situation conform?
- OPENNESS – Is the offer transparent?
- VALUE – Expensive or inexpensive?
- ETHICS – Does the offer fit with Academy’s ethics?
- IDENTITY – Who has made the offer?
- TIMING – Are you about to make a decision affecting the giver?

UK BRIBERY ACT 2010

- It is an offence under Section 7, which can be committed by a commercial organisation which fails to prevent persons associated with them from bribing another person on their behalf.
- Facilitation Payments, payments to induce officials to perform routine functions they are otherwise obligated to perform, are bribery under the Act.
- Trustees/Governors and Senior Leadership do not tolerate Bribery in any form.
- Senior Leadership considers all organisations which the Trust/School does business with, in order to consider the risk.
- Senior Leadership considers all persons or organisations which act on behalf of the Trust/School or provide services for the School, in order to consider the risk.
- Actions of suppliers of goods do not create a risk for the Trust/School under the UK Bribery Act 2010.
- As risk of bribery can often be greater in overseas transactions, all overseas transactions must be approved in writing on the purchase order by the Director of Finance and Chair of Finance Committee, regardless of the value of the transaction.

This policy should be read in conjunction with all Trust policies.



DETAILS OF AMENDMENTS

July 2019

- Updated to include Shiphay Learning Academy

September 2020

- Reviewed without changes

September 2021

- Reviewed without changes

September 2022

- Reviewed without changes

September 2023

- Reviewed without changes

July 2024

- No update

June 2025

- **Hospitality section, final bullet point, Academy's changed to Trust's and School changed to Finance**
- **Additional information in the gifts section:**
'In the case of a group of parents from children in the same class, for example, present a joint gift, the individual contributions should be considered rather than the total amount, but the PROVEIT test (below) should still be applied.'

